

# EXHIBIT K



March 5, 2024

*Via USPS First-Class Mail*

Ms. Tina Conn  
16 Lincoln Street  
Essex Junction, VT 05452

Re: Johnny Ha, Jenny Pham a/k/a Jenny Ha and Helen Le v. Tina Conn,  
Civil Action No. 2:20-cv-155-wks (U.S.D.C. Vt.)

Dear Ms. Conn:

I represent Plaintiffs Johnny Ha, Jenny Pham a/k/a Jenny Ha and Helen Le in the above-referenced case, which is pending against you in the United States District Court for the District of Vermont.

Enclosed please find a copy of my 13-page letter dated January 8, 2024 to your former attorney, Mr. Sherman, concerning multiple issues with your purported July 6, 2023 responses to Plaintiffs' July 2, 2021 Requests for Admission, Requests for the Production of Documents, and Interrogatories.

Presumably, Mr. Sherman provided you with a copy of my January 8th letter previously, but to be safe I am sending a copy to you directly now that you represent yourself.

On February 8, 2024, Mr. Sherman and I spoke by phone concerning my January 8th letter. During our call, Mr. Sherman assured me he was working on updated discovery responses and a supplemental document production, and he said I should receive them "soon." It is now March 5th and I have not received anything in response to my January 8th letter.

Given the fast track to trial that this case is on, as well as the fact that Plaintiffs plan to take your deposition by the end of April, please provide to me the discovery responses and documents requested in my January 8th letter as soon as possible, and in any event **no later than March 20, 2024**. In the meantime, Plaintiffs reserve all rights and remedies. Thanks in advance.

Sincerely yours,

/s/ Daniel A. Seff

Daniel A. Seff

Enclosure (1)

**MSK**  
ATTORNEYS

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